

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
Norfolk Division

UNITED STATES OF AMERICA)	
)	
v.)	CRIMINAL NO.: 2:16-cr-00017
)	
)	
SONYA SKINNER,)	
)	
Defendant.)	

MOTION FOR EXPEDITED SENTENCING HEARING

COMES NOW the defendant, Sonya Skinner, by and through counsel, and moves this Honorable Court for an expedited sentencing hearing for the following reasons:

The defendant appeared before this court on March 23, 2016, and entered a guilty plea to a Criminal Information and a Statement of Facts was filed the same date. Sentencing was scheduled for June 29, 2016. A complete presentence report was prepared on May 18, 2016 and a revised report was prepared on June 10, 2016. On July 5, 2016, the defendant entered a guilty plea to Count Three of the Criminal Information which was the original charging instrument under which she pled guilty on March 23, 2016. An Addendum to the plea agreement filed on March 23, 2016 was signed by the defendant and filed with the court on July 5, 2016. The Addendum references the same Statement of Facts that was filed with the Court on March 23, 2016. Pursuant to a Sentencing Procedures Order entered on July 5, 2016 by this Court, a sentencing hearing was set for October 27, 2016.

As it stands, the defendant pleaded guilty to a felony count of the original charging instrument under which she had previously pled guilty and the same Statement of Facts

apply to the felony to which she pled guilty, as to the misdemeanors to which she pled guilty on March 23, 2016. A complete presentence report was already prepared and indeed has been filed with this Court. It is counsel's understanding that only an addendum to the existing presentence report needs to be prepared to reflect the defendant's subsequent plea to a felony count, and the guidelines that have already been calculated in the existing presentence report should not change much, if at all, because of the guilty plea to the felony. The defendant has already accepted responsibility and acknowledged the conduct contained in the Statement of Facts.

The current guidelines recommend 6 to 12 months incarceration, or, if the Court sustains the defendant's objection to the enhancement for her role in the offense, the guidelines may end up being even lower.

Additionally, the defendant has been experiencing profuse bleeding. As verified in the presentence report dated May 18, 2016, prepared by United States Probation Officer Diane Moczydlowski, Ms. Skinner was diagnosed with fibroids in 2008, and suffers from heavy bleeding and a lack of energy. She is prescribed medication. Additionally, as verified in the same report, Ms. Skinner was treated at Riverside Hospital in Newport News approximately January 3, 2013 when she received a blood transfusion. She was diagnosed with low iron in the past, and she takes a medication by the name of Ferrosol.

Therefore, in light of the fact that the defendant will be incarcerated until October 27, 2016 if the court does not expedite the sentencing hearing, and in light of the fact that the sentencing guidelines are likely to recommend a sentence at the low end either a period of incarceration less than what the defendant will have been incarcerated for at the time of the sentencing hearing, or for a time equivalent to such time period, in light of the fact

that only an addendum to the existing presentence report needs to be prepared, and in light of the fact that the defendant is dealing with a serious medical issue, the defendant respectfully requests that the sentencing date for this matter be advanced on the Court's docket to the earliest possible date that is available to the Court and the parties.

Finally, it is Counsel's understanding that the Government does not object to an expedited sentencing hearing, as such request was contemplated at the time the agreement to execute an addendum to the plea agreement was reached.

Respectfully Submitted,

SONYA SKINNER

By s/
Of Counsel

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CERTIFICATE OF SERVICE

I certify that on this 14th day of July, 2016, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification (NEF) to:

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